

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

VALERIE THOMAS, M.D. and  
ROBERT E. THOMAS, JR., P.A.,  
individually and as Personal  
Representative of the Estate of Benjamin  
Thomas,

Plaintiffs,

vs.

Coca-Cola Company, Coca-Cola Bottling  
Company Consolidated, Piedmont Coca-  
Cola Bottling Partnership, Joseph James  
Stevens, Willbrook Links Investment  
Group, LLC, d/b/a Tradition Golf Club,  
Palmetto Labor Services, Inc., Nivardo  
Ramirez,

Defendants.

Civil Action No. 2:08-cv-01580-PMD

**GRANTED**

  
PATRICK MICHAEL DUFFY  
United States District Judge

**DEFENDANT COCA-COLA**  
**BOTTLING CO. CONSOLIDATED'S**  
**MOTION IN LIMINE REGARDING**  
**ANY SUGGESTION THAT JOSEPH**  
**STEVENS' DRIVER'S LICENSE WAS**  
**SUSPENDED**

Defendant Coca-Cola Bottling Company Consolidated ("CCBCC") hereby moves, *in limine*, to preclude Plaintiffs from tendering any insinuation at trial that Joseph Stevens' driver's license was ever suspended, either before or during his employment with CCBCC.

Throughout the discovery process, Plaintiffs' counsel has questioned virtually every lay and expert witness as to whether Joseph Stevens' driver's license was suspended shortly before he came to work for CCBCC, implying that it was. As established unequivocally by the Rule 30(b)(6) deposition of the South Carolina Department of Motor Vehicles on December 15, 2009, Joseph Stevens' driver's license was never suspended. (William Wannamaker Dep. Tr. at 5:6-17, 9:13 - 10:2) (attached as Ex. 1).